

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, ET AL.,

Plaintiffs,

v.

COX COMMUNICATIONS, INC. AND  
COXCOM, LLC.

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**REPLY DECLARATION OF  
THOMAS M. BUCHANAN IN  
FURTHER SUPPORT OF COX'S  
MOTION TO EXCLUDE THE  
TESTIMONY OF PUTATIVE  
EXPERT GEORGE P. MCCABE,  
Ph.D.**

I, Thomas M. Buchanan, hereby declare:

1. I am a partner at the law firm Winston & Strawn LLP, counsel to Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, "Cox") and represent Cox in the above-captioned matter. I submit this Declaration in further support of Cox's Motion to Exclude the Testimony of Putative Expert George P. McCabe, Ph.D. Except as otherwise stated, I have personal knowledge of all facts stated in this declaration and if called upon as a witness, I could and would competently testify thereto.

2. Attached as **Exhibit A** is a true and correct copy of the Supplemental/Rebuttal Report of Christian Tregillis, CPA, ABV, CFF, CLP, dated May 15, 2019.

3. Attached as **Exhibit B** is a true and correct copy of excerpts of the transcript of the hearing on a motion held before U.S. Mag. Judge John F. Anderson in this case, dated September 27, 2019.

4. Attached as **Exhibit C** is a true and correct copy of further excerpts of the transcript

of the videotaped deposition of George P. McCabe, Ph.D., dated June 20, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11<sup>th</sup> day of October, 2019 in Washington D.C.

/s/ Thomas M. Buchanan  
Thomas M. Buchanan (VSB No. 21530)